

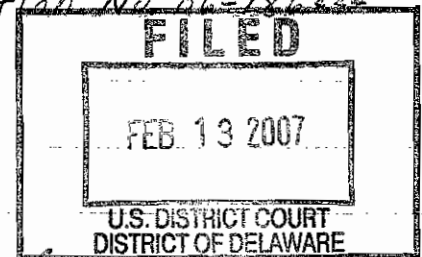
In The United States District Court
For The District of Delaware

Lynn Harris

v

Thomas Carroll

Civil Action No. 06-786438



Motion For Appointment of Counsel
Pursuant to 18 U.S.C.A. § 3006A

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Comes now, The defendant Lynn Harris,
respectFULLY requesting This Honorable
Court, to appoint Counsel to represent
my interest in this extraordinary matter.

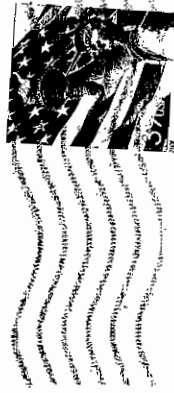
In Support of this "motion," the defendant
Submitts the Following:

1. The Petitioner is incarcerated, and it is imperative,
that Counsel be appointed to aide in the proving
of his claims For habeas Corpus relief.
2. There may be reconcilable claim with Former Counsel
due to ineffective assistance of Counsel at direct
appeal and filling timely notice of appeal which
is his continued obligation pursuant to Supreme

Court rule 26A Thus: There was no genuine good Faith argument when he knew he had to hold the state to prove every element of the offense; "Rule 31."

3. The defendant is unskilled in legal-skills necessary to prove the investigative-technique required for the extraordinary Constitutional claims involved.
4. The defendant, is in a maximum-security housing-unit where strict administrative limits on days, time and accessibility to the law library, Thus; making it extremely difficult to obtain adequate research materials.
5. Therefore, Pursuant to 18 U.S.C.A. § 3006A appointment of counsel, and a order for appointment of counsel would serve the best interest of justice in this case.
6. wherefore, The defendant respectfully request that this Honorable Court appoint counsel to represent him in this unique Habeas Corpus matter.

Respectfully Submitted
Lynn Harris
2/10/07



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Honorable Mary Pat Thyng
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